ANSWERS TO INTERROGATORIES

Document 56-19

- Up-To-Date Laundry, Inc. 1. 1221 DeSoto Road Baltimore, Maryland 21223
- 2. Nancy Stair - CEO/Secretary Brad Minetree - President David Minetree - Vice President Mike Kennedy – Operations Manager Maria Espinosa – Shift Supervisor / John Fitzgerald - Plant Manager hat, -Sony Sharki – Shift Supervisor

In addition to the above salaried manager/supervisors, the following are hourly paid "team leaders": Elijah Sewell, John Thomas, Michael Ashley, Keith Spriggs, Gregory Ratliffe, and Bridgette Lundy. Though they are not supervisors within the meaning of the National Labor Relations Act, they perform an important and valuable function for the Employer.

- 3. There are no computerized or machine readable files maintained by the Employer other than the Employee Earnings Records, which are prepared by an outside source. (See Exhibit No. 4 of Response Regarding Document Request for an example.)
- The Employer maintains no records showing when an employee starts on a job and is put on another job. Some such information may be gleaned from the Employee Earnings Records (see Response No. 7 to Document Production) and timecards (see Response No. 11 to Document Production).
- 5. Effective December 5, 1999, the starting rate for production employees is \$5.50 per hour. After 90 days, they are increased to \$6.00 per hour. Starting rate for truck drivers (straight) is \$8.50 per hour. After 90 days they are reviewed and, if satisfactory, increased to \$9.00 per hour. Starting rate for truck drivers (tractor trailer) is \$11.00-\$12.00, depending on prior experience. During December 1999, all production employees (without regard to length of service) whose rate was less than \$6.00 were increased to \$6.00.
- (16. Response forthcoming.
- Ŕ. Response forthcoming.
- 8. None.
- 9. None.
- 10. Response forthcoming.



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Feb. 14 2000 03:49PM

I hereby state that the above responses to Interrogatories are true and correct to the best of my knowledge and belief.

Date: February 4, 2000

Nancy Stair, CEO/Secretary

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